

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
                            )  
                            )  
                            v. )                            Criminal No. 21-10104-PBS  
                            )  
VLADISLAV KLYUSHIN, )  
a/k/a "Vladislav Klyushin" )  
IVAN ERMAKOV, )  
a/k/a "Ivan Yermakov", and )  
NIKOLAI RUMIANTCEV, )  
a/k/a "Nikolay Rumyantcev" )  
                            )  
                            )  
Defendants. )  
\_\_\_\_\_  
)

STIPULATION

The parties hereby stipulate and agree that defendant Vladislav Klyushin was arrested in Sion, Switzerland on March 21, 2021 at approximately 13:30 local time, which was 12:30 UTC time. This stipulation is admissible evidence.

Respectfully submitted,

VLADISLAV KLYUSHIN  
Defendant

By: /s Maksim Nemtsev  
MAKSIM NEMTSEV  
MARC FERNICH  
Counsel for Defendant

January 16, 2023

RACHAEL S. ROLLINS  
United States Attorney

/s/ Stephen E. Frank  
STEPHEN E. FRANK  
SETH B. KOSTO  
Assistant United States Attorneys